



United States
Department of
Agriculture

Food Safety
and Inspection
Service

Washington, D.C.
20250

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Dr. Rui Vargas
Director, Department of Inspection
for Products of Animal Origin
Ministry of Agriculture and Provisions
Division of International Commerce Control
Ministry of Agriculture Annex
Block D, 4th Floor, Room 436A
70043-900 Brasilia DF
BRAZIL

Dear Dr. Vargas:

The Food Safety and Inspection Service (FSIS) has completed two on-site audits of Brazil's meat inspection system. The audits were conducted from July 11 through August 3, 2001 and from January 9 through February 6, 2002. Enclosed are copies of the two final audit reports. Comments from the Government of Brazil have been included in each report as Attachment G. I sincerely apologize for the delay in providing these final audit reports to you.

I would like to thank you for participating in the February 26, 2002 conference call to discuss the audit results from the January 2002 audit. I appreciate your efforts to address the audit findings, especially the immediate institution of monthly supervisory visits in all certified establishments. In addition, we have reviewed the corrective actions taken by the establishments and the Government of Brazil to respond to the audit findings from both the 2001 and 2002 audits. FSIS has determined that the corrective actions satisfactorily address the audit deficiencies.

If you have any questions regarding these audits or need additional information, please contact me at 202-720-3781. My fax number is 202-690-4040 and my email address is sally.stratmoen@fsis.usda.gov.

Sincerely,

Sally Stratmoen
Acting Director
Equivalence Division
Office of International Affairs

Enclosures

cc:

William Westman, Agricultural Counselor, US Embassy, Brasilia

Colleen Magro, Trade Specialist, Embassy of Brazil

Karen Stuck, Acting Dep. Asst. Administrator, OIA

Robert Hoff, FAS Area Officer

Donald Smart, Review Staff, PEER

Sally Stratmoen, Acting Dir., ED, OIA

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Nancy Goodwin, ED, OIA

Country File (Brazil FY 2001 and 2002 Audits—Finals to CVO)



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AUDIT REPORT FOR BRAZIL JULY 11 THROUGH AUGUST 3, 2001

INTRODUCTION

Background

This report reflects information that was obtained during an audit of Brazil's meat inspection system from July 11 through August 3, 2001. Nine of the 28 establishments certified to export meat to the United States were audited. Six of these were slaughter establishments, two were conducting processing operations and one was a cold storage facility.

The last audit of the Brazilian meat inspection system was conducted in June 2000. Nine establishments were audited: eight were acceptable (1651, 42, 3031, 862, 337, 226, 736, and 412), and one was unacceptable (458). One major concern was reported at that time. HACCP implementation was inadequate in Establishment 458.

Any meat products from Brazil (all species) must be cooked, including shelf stable canned product.

During calendar year 2001, Brazilian establishments exported nearly 42 million pounds of beef to the U.S. Port-of-entry (POE) rejections were for microbiological contamination (0.32% of the total), unsound condition (0.13 %), composition/standard (0.17 %) and transportation damage and missing shipping marks (0.02% combined).

PROTOCOL

This on-site audit was conducted in four parts. One part involved visits with the Brazilian National Meat Inspection Officials to discuss oversight programs and practices, including enforcement activities. The second entailed an audit of a selection of records in the meat inspection headquarters facilities preceding the on-site visits. The third was conducted by on-site visits to establishments. The selection of the establishments for these audits was based on the examination of the import station records, the results of the previous audit, and randomly. The fourth part was a visit to two laboratories, one performing analytical testing of field samples for the national residue testing program, and the other culturing field samples for the presence of microbiological contamination with *Salmonella*.

Brazil's program effectiveness was assessed by evaluating five areas of risk: (1) sanitation controls, including the implementation and operation of Sanitation Standard Operating Procedures (SSOPs), (2) animal disease controls, (3) residue controls, (4) slaughter/processing controls, including the implementation and operation of Hazard Analysis and Critical Control Point (HACCP) systems and the *E. coli* testing program, and (5) enforcement controls, including the testing program for *Salmonella* species.

During all on-site establishment visits, the auditor evaluated the nature, extent, and degree to which findings impacted on food safety and public health, as well as overall program delivery. The auditor also determined if establishment and inspection system controls were in place. Establishments that do not have effective controls in place to prevent, detect and eliminate product contamination/adulteration are considered unacceptable and therefore ineligible to export products to the U.S., and are delisted accordingly by the country's meat inspection officials.

RESULTS AND DISCUSSION

Summary

Effective inspection system controls were found to be in place in six of the nine establishments audited; three (4507, 458 and 504) of these were recommended for re-review. Details of audit findings, including compliance with HACCP, SSOPs, and testing programs for *Salmonella* and generic *E. coli*, are discussed later in this report.

As stated above, one major concern had been identified during the last audit of the Brazilian meat inspection system, conducted in June 2000. This concern dealt with HACCP implementation that was inadequate in Establishment 458. During this new audit, the auditor determined that the concern had been addressed and corrected.

HACCP-implementation deficiencies were found in six of the nine establishments visited (2979, 4507, 458, 504, 1662 and 385). Details are provided in the HACCP-implementation section later in this report.

Entrance Meeting

On July 20, an entrance meeting was held in the Brasilia offices of the Divisao do Comercio Internacional/Departamento de Inspecao de Productos de Origen Animal (DCI/DIPOA), and was attended by: Dr. Marcello Mazzini, Chief of DCI/DIPOA; Dr. Andreia Galvao, DCI/DIPOA; Dr. Ari Anjos, DCI/DIPOA; Ms. Conceicao Souza, CLA/DIPOA; Mr. Joao Silva, Agriculture Specialist, U.S. Embassy; and Dr. M. Douglas Parks, International Audit Staff Officer, FSIS/USDA.

Topics of discussion included the following:

1. Establishments to be visited and the itinerary of the audit.
2. Establishments for records only audits in Brasilia.
3. Laboratories and the farm to be visited.
4. Information to be supplied about National Residue Testing Program, Species Testing and the Enforcement and Compliance Program.
5. The *Salmonella* problem in product from Establishment 458.
6. The feeding of ruminant protein back to ruminants.

Headquarters Audit

There had been no changes in the organizational structure or upper levels of inspection staffing since the last U.S. audit of Brazil's inspection system in June 2000.

To gain an accurate overview of the effectiveness of inspection controls, FSIS requested that the inspection officials who normally conduct the periodic reviews for compliance with U.S. specifications lead the audits of the individual establishments. The FSIS auditor (hereinafter called "the auditor") observed and evaluated the process.

The auditor conducted a review of inspection system documents pertaining to the establishments listed for records review. This records review was conducted at the headquarters of the inspection service. The records review focused primarily on food safety hazards and included the following:

- Internal review reports.
- Supervisory visits to establishments that were certified to export to the U.S.
- Training records for inspectors and laboratory personnel.
- Label approval records such as generic labels, and animal raising claims.
- New laws and implementation documents such as regulations, notices, directives and guidelines.
- Sampling and laboratory analyses for residues.
- Pathogen reduction and other food safety initiatives such as SSOPs, HACCP programs, generic *E. coli* testing and *Salmonella* testing.
- Sanitation, slaughter and processing inspection procedures and standards.
- Control of products from livestock with conditions such as tuberculosis, cysticercosis, etc., and of inedible and condemned materials.
- Export product inspection and control including export certificates.

- Enforcement records, including examples of criminal prosecution, consumer complaints, recalls, seizure and control of noncompliant product, and withholding, suspending, withdrawing inspection services from or delisting an establishment that is certified to export product to the United States.

The following concerns arose as a result of the examination of these documents:

1. In-depth knowledge of HACCP is lacking in most establishments, e.g., Critical Control Point (CCP) selection, setting limits for CCP's, recording of preventive action, and pre-shipment review.

Government Oversight

All inspection veterinarians and inspectors in establishments certified by Brazil as eligible to export meat products to the United States were full-time DIPOA employees, receiving no remuneration from either industry or establishment personnel.

Establishment Audits

Twenty-eight establishments were certified to export meat products to the United States at the time this audit was conducted. Nine establishments were visited for on-site audits. In six of the nine establishments visited, both DIPOA inspection system controls and establishment system controls were in place to prevent, detect and control contamination and adulteration of products. In three of the establishments serious deficiencies were observed that resulted in their placement in the acceptable/re-review category. These deficiencies are discussed later in this report.

Laboratory Audits

During the laboratory audits, emphasis was placed on the application of procedures and standards that were equivalent to U.S. requirements. Information was also collected about the risk areas of government oversight of accredited, approved, and private laboratories, intra-laboratory quality assurance procedures, including sample handling, and methodology.

The Laboratório Regional de Apoio Animal (LARA) in Campinas was audited on July 25, 2001. Effective controls were in place for sample handling and frequency, timely analysis, data reporting, tissue matrices for analysis, equipment operation and printouts, minimum detection levels, recovery frequency, percent recoveries, and corrective actions. The methods used for the analyses were acceptable. No compositing of samples was done. The check sample program did meet FSIS requirements. This laboratory has responsibilities in the residue testing program as well as the *E. coli* and *Salmonella* testing programs.

Some of Brazil's microbiological testing was being performed in private laboratories. One of these, the Microbiotics Analises Laboratoriais in Sao Paulo was audited on July 27, 2001. The auditor determined that the system met the criteria established for the use of private laboratories.

These criteria are:

1. The laboratories have been accredited/approved by the government, accredited by third party accrediting organization with oversight by the government, or a government contract laboratory.
2. The laboratories have properly trained personnel, suitable facilities and equipment, a written quality assurance program, and reporting and record-keeping capabilities.
3. Results of analyses are being reported to the government or simultaneously to the government and establishment.

Establishment Operations by Establishment Number

The following operations were being conducted in the nine establishments:

Beef slaughter and boning - five establishments (2979, 4507, 3181, 1662 and 504)
Beef slaughter, boning, canning and cooked frozen beef (385)
Beef canning and cooked frozen beef (458)
Beef processing (jerky) (3673)
Cold storage (no processing) (785)

SANITATION CONTROLS

Based on the on-site audits of establishments, Brazil's inspection system had controls in place for basic establishment facilities, condition of facilities and equipment, product protection and handling and the establishment sanitation program. There was one area of concern in establishment 504. Carcasses with contaminated condensate on them were being sent to the boning room without overall trimming.

Sanitation Standard Operating Procedures (SSOPs)

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOPs were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment A).

The SSOPs were found to meet the basic FSIS regulatory requirements, with only occasional minor variations, except in Establishment 3673 where production start was delayed because of sanitation problems discovered on pre-operational sanitation inspection. No records of the problems or corrective action were found.

Cross-Contamination

1. Over-spray above the carcass wash was falling from the contaminated rail onto the carcasses in two establishments (2979 and 1662).
2. The moving viscera table was coming up with residues from the previous use in three establishments (2979, 1662 and 385).
3. The employee, who was cutting across the anus, continued the cut into other tissues without sanitizing the knife in two establishments (1662 and 4507).
4. The buccal cavity was opened before the mouth cavity was washed resulting in possible contamination of exposed product with ingesta in establishment 785.

All of these sanitation problems were corrected immediately by company personnel.

Product Handling and Storage

Meat products and non-meat ingredients were found to be stored under sanitary conditions in all establishments.

Personnel Hygiene and Practices

These practices were found to be acceptable in all establishments.

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ANIMAL DISEASE CONTROLS

Brazil's inspection system had controls in place to ensure adequate animal identification, ante-mortem and post-mortem inspection procedures and dispositions, condemned and restricted product control, and procedures for sanitary handling of returned and rework product.

There were reported to have been no outbreaks of animal diseases with public-health significance since the previous U.S. audit.

RESIDUE CONTROLS

Brazil's National Residue Testing Plan for 2001 was being followed, and was on schedule. The Brazilian inspection system had adequate controls in place to ensure compliance with sampling, reporting procedures, and the storage and use of chemicals.

A farm was visited on July 20, 2001. The only problem noted was that calf treatment medication was in stock that contained chloramphenicol. The manager stated that it was used for calf scours in baby calves and that no calves were ever sold until they were at least a year old.

SLAUGHTER/PROCESSING CONTROLS

Except as noted below, the Brazilian inspection system had controls in place to ensure adequate ante-and post-mortem inspection procedures and dispositions, control and disposition of dead, dying, diseased or disabled animals, humane handling and slaughter.

1. It was observed in one establishment (4507) that all animals were being hit with the captive bolt stunner at least two times. The operations were stopped and the operator was instructed in the correct procedure by the company supervisor.

HACCP Implementation

All establishments approved to export meat products to the U.S. are required to have developed and implemented a Hazard Analysis – Critical Control Point (HACCP) system. Each of these systems was evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment B).

With the following exceptions, the HACCP programs were found to meet the basic FSIS regulatory requirements.

1. There were problems seen in HACCP implementation.
 - a) Critical limits that were set were not measurable in four establishments (2979, 4507, 458 and 3673).
 - b) Pre-shipment reviews were not done in six establishments (2979, 4507, 458, 504, 1662 and 385).
2. In-depth knowledge of HACCP is lacking in most establishments, e.g. Critical Control Point (CCP) selection, setting limits for CCP's, recording of preventive action, and pre-shipment review.

Testing for Generic *E. coli*

Brazil has adopted the FSIS regulatory requirements for generic *E. coli* testing.

Six of the establishments audited were required to meet the basic FSIS regulatory requirements for generic *E. coli* testing, and were audited and evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment C).

The *E. coli* testing programs were found to meet the basic FSIS regulatory requirements.

Additionally, establishments had adequate controls in place to prevent meat products intended for Brazilian domestic consumption from being commingled with products eligible for export to the U.S.

ENFORCEMENT CONTROLS

Inspection System Controls

The DIPOA inspection system controls restricted product and inspection samples, boneless meat re-inspection, shipment security, including shipment between establishments, prevention of commingling of product intended for export to the United States with domestic product, monitoring and verification of establishment programs and controls (including the taking and documentation of corrective actions under HACCP plans), inspection supervision and documentation, the importation of only eligible livestock or poultry from other countries (i.e., only from eligible countries and certified establishments within those countries, and the importation of only eligible meat or poultry products from other countries for further processing) were in place and effective in ensuring that products produced by the establishment were wholesome, unadulterated, and properly labeled. In addition, adequate controls were found to be in place for security items, shipment security, and products entering the establishments from outside sources.

The laws of Brazil do not provide for convicted felons (meat law violators) to be barred from further involvement in the meat industry.

Testing for *Salmonella* Species

Six of the establishments audited were required to meet the basic FSIS regulatory requirements for *Salmonella* testing, and were evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment D).

Brazil has adopted the FSIS regulatory requirements for *Salmonella* testing with exception of the following equivalent measures:

1. The establishment takes the sample but always under inspection supervision.
2. The samples are analyzed in private accredited laboratories.
3. The enforcement strategy is similar but after one positive the plant is removed from U.S. export list and must reassess the HACCP plan and meet the performance standards.

Species Verification Testing

At the time of this audit, Brazil was not exempt from the species verification-testing requirement. The auditor verified that species verification testing was being conducted in accordance with FSIS requirements.

Monthly Reviews

These reviews were being performed by the Brazilian equivalent of Circuit Supervisors. All were veterinarians with many years of experience. Dr. Ari Crispim dos Anjos was in charge of the U.S. export establishments.

The internal review program was applied equally to both export and non-export establishments. Internal review visits were not always announced in advance and were conducted at times by individuals and at other times by a team of reviewers. For U.S. certified establishments, these reviews are not on a monthly basis. An auditor from Brasilia visits two times a year and an auditor from the State (district) Office visits four times a year. The records of audited establishments were kept in the inspection offices of the individual establishments, and copies were also kept in the central DIPOA offices in Brasilia.

In the event that an establishment is found, during one of these internal reviews, to be out of compliance with U.S. requirements, and is delisted for U.S. export, before it may again qualify for eligibility to be reinstated, a team is empowered to conduct an in-depth review, and the results are reported to Dr. Ari for evaluation; they formulate a plan for corrective actions and preventive measures.

Enforcement Activities

The enforcement activities of meat establishments producing beef during the year of 2000 and January through June 2001 are as follows: 155 violations which resulted in 62 warnings and 79 penalties (fines), with a total value of 282,100 UFIRS (US\$121,303).

Exit Meetings

An exit meeting was conducted in Brasilia on August 3, 2001. The participants were: Dr. Rui Vargas, Director DCI/DIPOA; Dr. Marcello Mazzini, Chief DCI/DIPOA; Dr. Ari Andros, DCI/DIPOA; Dr. Andreia Galvao, DCI/DIPOA; Ms. Milene Ce, DCI/DIPOA; Mr. William Westman, Agricultural Counselor, U.S. Embassy; Mr. Joao Silva, Agriculture Specialist, U.S. Embassy; and Dr. M. Douglas Parks, International Audit Staff Officer, FSIS/USDA. The following topics were discussed:

1. The FSIS Residue Questionnaire response was received.
2. The *Salmonella* situation in Establishment 458 was discussed. On more than one occasion, *Salmonella* was found in cooked frozen product samples at the import station in the U.S.

An investigation by the establishment revealed that the hydraulic oil was contaminated with *Salmonella* and was leaking from a cooked product press onto the exposed product.

The oil was changed to a USDA approved edible oil and everything was disinfected. A daily microbiological test was to be done on the oil, the product, and the machine to assure that the problem had been solved. This was to be done for two weeks before shipments are resumed to the U.S. This was to be monitored by DIPOA Officials to ensure compliance. A report will be sent to FSIS as soon as the testing is complete.

3. Documentation of the past year's enforcement activities was asked for but not received.
4. The problems with HACCP implementation were discussed and assurances were given that increased training in this area would be started immediately.
5. The policy was explained that establishments that are rated less than acceptable at this time must be acceptable at the next audit or they would be removed from the eligibility list.
6. The failure of Establishment 471 officials to show up in Brasilia for a records audit was discussed and the reason given was failure of the State Office to notify the establishment of the audit. It was proposed that Dr. Ari would go to the establishment and conduct an on-site audit within the next two weeks and send a report to FSIS. This proposal was accepted by all parties.
7. Monthly visits to U.S. certified establishments by DIPOA personnel to verify compliance with U.S. rules was discussed and the U.S. requirement of a visit each month was made clear. Brazil is not complying with this requirement.

CONCLUSION

The inspection system of Brazil was found to have effective controls to ensure that product destined for export to the United States was produced under conditions equivalent to those which FSIS requires in domestic establishments. Nine establishments were audited: six were acceptable, three were evaluated as acceptable/re-review. The deficiencies encountered during the on-site establishment audits in those establishments which were found to be acceptable and acceptable/re-review were adequately addressed to the auditor's satisfaction.

Dr. M. Douglas Parks
International Audit Staff Officer

(signed) Dr. M. Douglas Parks

ATTACHMENTS

- A. Data collection instrument for SSOPs
- B. Data collection instrument for HACCP programs
- C. Data collection instrument for *E. coli* testing
- D. Data collection instrument for *Salmonella* testing
- E. Laboratory Audit Forms
- F. Individual Foreign Establishment Audit Forms
- G. Written Foreign Country's Response to the Draft Final Audit Report

Data Collection Instrument for SSOPs

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOPs were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument contained the following statements:

1. The establishment has a written SSOP program.
2. The procedure addresses pre-operational sanitation.
3. The procedure addresses operational sanitation.
4. The pre-operational procedures address (at a minimum) the cleaning of food-contact surfaces of facilities, equipment, and utensils.
5. The procedure indicates the frequency of the tasks.
6. The procedure identifies the individuals responsible for implementing and maintaining the activities.
7. The records of these procedures and any corrective action taken are being maintained on a daily basis.
8. The procedure is dated and signed by the person with overall on-site authority.

The results of these evaluations were as follows:

Est. #	1. Written program addressed	2. Pre-op sanitation addressed	3. Oper. sanitation addressed	4. Contact surfaces addressed	5. Frequency addressed	6. Responsible indiv. identified	7. Documentation done daily	8. Dated and signed
2979	√	√	√	√	√	√	√	√
4507	√	√	√	√	√	√	√	√
785	√	√	√	√	√	√	√	√
3181	√	√	√	√	√	√	√	√
458	√	√	√	√	√	√	√	√
504	√	√	√	√	√	√	√	√
1662	√	√	√	√	√	√	√	√
385	√	√	√	√	√	√	√	√
3673	√	√	√	√	√	√	no	no

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit:

337	√	√	√	√	√	√	√	√
76	√	√	√	√	√	√	√	√
2023	√	√	no	√	√	√	√	√
421	√	√	√	√	√	√	√	√
1793	√	√	√	n/a	√	no	√	no
2427	√	no	√	n/a	√	no	√	no
2909	√	√	√	n/a	√	√	√	√
3155	√	√	√	n/a	√	no	no	√
226	√	√	√	√	√	√	√	no
471	Did	not	show	for	audit			

Data Collection Instrument for HACCP Programs

Each of the establishments approved to export meat products to the U.S. (except Est. 785, which was a cold-storage facility) was required to have developed and implemented a Hazard Analysis – Critical Control Point (HACCP) system. Each of these systems was evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument included the following statements:

1. The establishment has a flow chart that describes the process steps and product flow.
2. The establishment has conducted a hazard analysis that includes food safety hazards likely to occur.
3. The analysis includes the intended use of or the consumers of the finished product(s).
4. There is a written HACCP plan for each product where the hazard analysis revealed one or more food safety hazard(s) reasonably likely to occur.
5. All hazards identified in the analysis are included in the HACCP plan; the plan lists a CCP for each food safety hazard identified.
6. The HACCP plan specifies critical limits, monitoring procedures, and the monitoring frequency performed for each CCP.
7. The plan describes corrective actions taken when a critical limit is exceeded.
8. The HACCP plan was validated using multiple monitoring results.
9. The HACCP plan lists the establishment's procedures to verify that the plan is being effectively implemented and functioning and the frequency for these procedures.
10. The HACCP plan's record-keeping system documents the monitoring of CCPs and/or includes records with actual values and observations.
11. The HACCP plan is dated and signed by a responsible establishment official.
12. The establishment is performing routine pre-shipment document reviews.

The results of these evaluations were as follows:

Est. #	1. Flow diagram	2. Hazard analysis conducted	3. Use & users included	4. Plan for each hazard	5. CCPs for all hazards	6. Monitoring is specified	7. Corr. actions are described	8. Plan validated	9. Adequate verific. procedures	10. Adequate documentation	11. Dated and signed	12. Pre-shipment doc. review
2979	√	√	√	√	√	no	√	√	√	√	√	no
4507	√	√	√	√	√	no	no	√	√	√	√	no
785	cold	storage	only									
3181	√	√	√	√	√	√	√	√	√	√	√	√
458	√	√	√	√	√	no		√	√	√	√	no
504	√	√	√	√	√	√	√	√	√	√	√	no
1662	√	√	√	√	√	√	√	√	√	√	√	no
385	√	√	√	√	√	√	√	√	√	√	√	no
3673	√	√	√	√	√	no	√	√	√	√	√	√

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit:

337	√	√	√	√	√	√	√	√	√	√	√	√
76	√	√	√	√	√	no	√	√	√	no	√	no
2023	√	√	√	√	√	√	no	√	√	√	√	no
421	√	√	√	√	√	no	√	no	√	√	√	no
1793	cold	storage	only									
2427	cold	storage	only									
2909	cold	storage	only									
3155	cold	storage	only									
226	√	√	√	√	√	no	√	√	√	no	√	√
471	did	not	show	for	audit							

Data Collection Instrument for Generic *E. coli* Testing

Each establishment (except Est. 785, which was a cold-storage facility and Est. 458 and 3673, which were processing only) was evaluated to determine if the basic FSIS regulatory requirements for generic *E. coli* testing were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument contained the following statements:

1. The establishment has a written procedure for testing for generic *E. coli*.
2. The procedure designates the employee(s) responsible to collect the samples.
3. The procedure designates the establishment location for sample collecting.
4. The sample collection is done on the predominant species being slaughtered.
5. The sampling is done at the frequency specified in the procedure.
6. The proper carcass site(s) and/or collection methodology (sponge or excision) is/are being used for sampling.
7. The carcass selection is following the random method specified in the procedure or is being taken randomly.
8. The laboratory is analyzing the sample using an AOAC Official Method or an equivalent method.
9. The results of the tests are being recorded on a process control chart showing the most recent test results.
10. The test results are being maintained for at least 12 months.

Est. #	1. Written procedure	2. Sampler designated	3. Sampling location given	4. Predominant species sampled	5. Sampling at the req'd freq.	6. Proper site or method	7. Sampling is random	8. Using AOAC method	9. Chart or graph of results	10. Results are kept at least 1 yr
2979	ran	out	of	time						
4507	√	√	√	√	√	√	√	√	√	√
785	cold	storage	only							
3181	√	√	√	√	√	√	√	√	√	√
1662	√	√	√	√	√	√	√	√	√	√
458	proce-	ssing	only							
504	√	√	√	√	√	√	√	√	√	√
385	√	√	√	√	√	√	√	√	√	√
3673	proce-	ssing	only							

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit:

337	√	√	√	√	√	√	√	√	√	√
76	proce-	ssing	only							
2023	proce-	ssing	only							
421	√	√	√	√	√	√	√	√	√	√
1793	cold	storage	only							
2427	cold	storage	only							
2909	cold	storage	only							
3155	cold	storage	only							
226	proce-	ssing	only							
471	did	not	show	for	audit					

Data Collection Instrument for *Salmonella* testing

Each slaughter establishment was evaluated to determine if the basic FSIS regulatory requirements for *Salmonella* testing were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument included the following statements:

1. *Salmonella* testing is being done in this establishment.
2. Carcasses are being sampled.
3. Ground product is being sampled.
4. The samples are being taken randomly.
5. The proper carcass site(s) and/or collection of proper product (carcass or ground) is being used for sampling.
6. Establishments in violation are not being allowed to continue operations.

The results of these evaluations were as follows:

Est. #	1. Testing as required	2. Carcasses are sampled	3. Ground product is sampled	4. Samples are taken randomly	5. Proper site and/or proper prod.	6. Violative est's stop operations
2979	not	enough	time			
4507	√	√	N/A	√	√	√
785	cold	storage	only			
3181	√	√	N/A	√	√	√
458	processing	only				
504	√	√	N/A	√	√	√
1662	√	√	N/A	√	√	√
385	√	√	N/A	√	√	√
3673	processing	only				

Documentation was also audited from the following establishments that were not visited on-site, during the centralized document audit:

337	√	√	N/A	√	√	√
76	processing	only				
2023	processing	only				
421	√	√	N/A	√	√	√
1793	cold	storage	only			
2427	cold	storage	only			
2909	cold	storage	only			
3155	cold	storage	only			
226	processing	only				
471	did	not	show	for	audit	

REVIEW DATE
July 25, 2001NAME OF LABORATORY
Laboratorio Regional de Apoio Animal (LARA/SP)

FOREIGN COUNTRY LABORATORY REVIEW

FOREIGN GOV'T AGENCY Divisao de Controle do Comercio Intern. Departamento de Inspecao de Produtos de <i>ORIGEM ANIMAL</i>	CITY & COUNTRY Campinas, Brazil	ADDRESS OF LABORATORY Rue Raul Ferrari C. P. 5538 Campinas/SP
NAME OF REVIEWER Mr. M. Douglas Parks	NAME OF FOREIGN OFFICIAL Dr. Ari Crispim Dos Anjos	

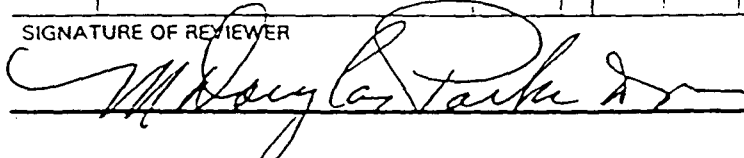
Residue Code/Name

124 100 401 404 406 501 510 512 513

SAMPLING PROCEDURES														
REVIEW ITEMS	ITEM #		124	100	401	404	406	501	510	512	513			
Sample Handling	01	EVALUATION CODE	A	A	A	A	A	A	A	A	A			
Sampling Frequency	02		A	A	A	A	A	A	A	A	A			
Timely Analyses	03		A	A	A	A	A	A	A	A	A			
Compositing Procedure	04		O	O	O	O	O	O	O	O	O			
Interpret Comp Data	05		O	O	O	O	O	O	O	O	O			
Data Reporting	06		A	A	A	A	A	A	A	A	A			
ANALYTICAL PROCEDURES														
Acceptable Method	07	EVALUATION CODE	A	A	A	A	A	A	A	A	A			
Correct Tissue(s)	08		A	A	A	A	A	A	A	A	A			
Equipment Operation	09		A	A	A	A	A	A	A	A	A			
Instrument Printouts	10		A	A	A	A	A	A	A	A	A			
QUALITY ASSURANCE PROCEDURES														
Minimum Detection Levels	11	EVALUATION CODE	A	A	A	A	A	A	A	A	A			
Recovery Frequency	12		A	A	A	A	A	A	A	A	A			
Percent Recovery	13		A	A	A	A	A	A	A	A	A			
Check Sample Frequency	14		A	A	A	A	A	A	A	A	A			
All analyst w/Check Samples	15		A	A	A	A	A	A	A	A	A			
Corrective Actions	16		A	A	A	A	A	A	A	A	A			
International Check Samples	17	A	A	A	A	A	A	A	A	A	A			
REVIEW PROCEDURES														
Corrected Prior Deficiencies	18	EVAL. CODE	A	A	A	A	A	A	A	A	A			
OTHER REVIEW														
	19	EVAL. CODE												
	20													

SIGNATURE OF REVIEWER

DATE



25 July 01

FOREIGN COUNTRY LABORATORY REVIEW

REVIEW DATE
July 25, 2001

NAME OF FOREIGN LABORATORY
Laboratorio Regional de Apoio Animal (LARA/SP)

FOREIGN GOV'T AGENCY
Instituto de Controle do Comercio Intern.
Departamento de Inspecao de Productos de
ORIGEM ANIMAL

CITY & COUNTRY
Campinas, Brazil

ADDRESS OF LABORATORY
Rue Raul Ferrari
C. P. 5538 Campinas/SP

NAME OF REVIEWER
M. Douglas Parks

NAME OF FOREIGN OFFICIAL
Dr. Ari Crispim Dos Anjos

SIDUE
DOES

ITEM
NO.

COMMENTS

The "mother" stock solutions are prepared for one year use and dated as such. Some were found with two year old dates. The solutions is assayed for proper strength before use

July 27, 2001

Microbolicos Analises Laboratorias

FOREIGN COUNTRY LABORATORY REVIEW

FOREIGN GOV'T AGENCY Divisao de Controle do Comercio Intern. Dept. de Inspecao de Produtos de Animal		CITY & COUNTRY Campinas, Brazil	ADDRESS OF LABORATORY Caixa Postal 6175-CEP :13084-971 Campinas/ SP
NAME OF REVIEWER Dr. M. Douglas Parks		NAME OF FOREIGN OFFICIAL Dr. Ari Crispim Dos Anjos	

Residue Code/Name			501	510	500A	500				
SAMPLING PROCEDURES	REVIEW ITEMS	ITEM #								
	Sample Handling	01	A	A	A	A				
	Sampling Frequency	02	A	A	A	A				
	Timely Analyses	03	A	A	A	A				
	Compositing Procedure	04	O	O	O	O				
	Interpret Comp Data	05	O	O	O	O				
	Data Reporting	06	A	A	A	A				
ANALYTICAL PROCEDURES	Acceptable Method	07	A	A	A	A				
	Correct Tissue(s)	08	A	A	A	A				
	Equipment Operation	09	A	A	A	A				
	Instrument Printouts	10	A	A	A	A				
QUALITY ASSURANCE PROCEDURES	Minimum Detection Levels	11	A	A	A	A				
	Recovery Frequency	12	A	A	A	A				
	Percent Recovery	13	A	A	A	A				
	Check Sample Frequency	14	A	A	A	A				
	All analyst w/Check Samples	15	A	A	A	A				
	Corrective Actions	16	A	A	A	A				
	International Check Samples	17	A	A	A	A				
REVIEW PROCEDURES	Corrected Prior Deficiencies	18	A	A	A	A				
OTHER REVIEW		19								
		20								

SIGNATURE OF REVIEWER

M. Douglas Parks

DATE

27 July 01

(Comment Sheet)

Microbóticos Analises Laboratoriais

ADDRESS OF LABORATORY
Caixa Postal 6175-CEP :13084-971
Campinas/ SP

NAME OF FOREIGN OFFICIAL
Dr. Ari Crispim Dos Anjos

RESIDUE CODES	ITEM NO.	COMMENTS
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U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE INTERNATIONAL PROGRAMS		REVIEW DATE	ESTABLISHMENT NO. AND NAME		CITY
FOREIGN PLANT REVIEW FORM		July 12, 2001	Friboi SIF 2979		Araputanga
				COUNTRY	
				Brazil	
NAME OF REVIEWER Dr. M. Douglas Parks		NAME OF FOREIGN OFFICIAL Dr. Ari Crispim Dos Anjos		EVALUATION <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable	
CODES (Give an appropriate code for each review item listed below)					
A = Acceptable M = Marginally Acceptable U = Unacceptable N = Not Reviewed O = Does not apply					
1. CONTAMINATION CONTROL		Cross contamination prevention		28 M	Formulations
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing		29 A	Packaging materials
Water potability records	01 A	Product handling and storage		30 A	Laboratory confirmation
Chlorination procedures	02 A	Product reconditioning		31 A	Label approvals
Back siphonage prevention	03 A	Product transportation		32 A	Special label claims
Hand washing facilities	04 A	(d) ESTABLISHMENT SANITATION PROGRAM			Inspector monitoring
Sanitizers	05 A	Effective maintenance program		33 A	Processing schedules
Establishments separation	06 A	Preoperational sanitation		34 A	Processing equipment
Pest --no evidence	07 A	Operational sanitation		35 A	Processing records
Pest control program	08 A	Waste disposal		36 A	Empty can inspection
Pest control monitoring	09 A	2. DISEASE CONTROL			Filling procedures
Temperature control	10 A	Animal identification		37 A	Container closure exam
Lighting	11 A	Antemortem inspec. procedures		38 A	Interim container handling
Operations work space	12 A	Antemortem dispositions		39 A	Post-processing handling
Inspector work space	13 A	Humane Slaughter		40 A	Incubation procedures
Ventilation	14 A	Postmortem inspec. procedures		41 A	Process. defect actions -- plant
Facilities approval	15 A	Postmortem dispositions		42 A	Processing control -- inspection
Equipment approval	16 A	Condemned product control		43 A	5. COMPLIANCE/ECON. FRAUD CONTROL
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control		44 A	Export product identification
Over-product ceilings	17 A	Returned and rework product		45 A	Inspector verification
Over-product equipment	18 U	3. RESIDUE CONTROL			Export certificates
Product contact equipment	19 A	Residue program compliance		46 A	Single standard
Other product areas (inside)	20 A	Sampling procedures		47 A	Inspection supervision
Dry storage areas	21 A	Residue reporting procedures		48 A	Control of security items
Antemortem facilities	22 A	Approval of chemicals, etc.		49 A	Shipment security
Welfare facilities	23 A	Storage and use of chemicals		50 A	Species verification
Outside premises	24 A	4. PROCESSED PRODUCT CONTROL			"Equal to" status
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim		51 U	Imports
Personal dress and habits	25 A	Boneless meat reinspection		52 A	
Personal hygiene practices	26 A	Ingredients identification		53 A	
Sanitary dressing procedures	27 A	Control of restricted ingredients		54 A	

FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE July 12, 2001	ESTABLISHMENT NO. AND NAME Friboi SIF 2979	CITY Araputanga
			COUNTRY Brazil
NAME OF REVIEWER Dr. M. Douglas Parks	NAME OF FOREIGN OFFICIAL Dr. Ari Crispim Dos Anjos		EVALUATION <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable

COMMENTS:

51--Rail dirt found on carcasses before and after pre-boning trim.

28--In the carcass wash area, water overspray was falling from the rail onto exposed carcasses.

19--In the slaughter area, the moving visera table was coming up for use with residues from previous uses.

SSOP--No preventative action being recorded

HACCP--Some critical limits are not measurable.

HACCP--Pre-shipment review is not being preformed.

FOREIGN PLANT REVIEW FORM

REVIEW DATE
July 13,
2001

ESTABLISHMENT NO. AND NAME
Bertin Ltda SIF 4507

CITY
Mozarlandia

COUNTRY
Brazil

NAME OF REVIEWER
Dr. M. Douglas Parks

NAME OF FOREIGN OFFICIAL
Dr. Ari Crispim Dos Anjos

EVALUATION

☐ Acceptable ☒ Acceptable/
Re-review ☐ Unacceptable

CODES (Give an appropriate code for each review item listed below)

A = Acceptable M = Marginally Acceptable U = Unacceptable N = Not Reviewed O = Does not apply

1. CONTAMINATION CONTROL		Cross contamination prevention	28 M	Formulations	55 A
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing	29 A	Packaging materials	56 A
Water potability records	01 A	Product handling and storage	30 A	Laboratory confirmation	57 A
Chlorination procedures	02 A	Product reconditioning	31 A	Label approvals	58 A
Back siphonage prevention	03 A	Product transportation	32 A	Special label claims	59 O
Hand washing facilities	04 A	(d) ESTABLISHMENT SANITATION PROGRAM		Inspector monitoring	60 A
Sanitizers	05 A	Effective maintenance program	33 A	Processing schedules	61 O
Establishments separation	06 A	Preoperational sanitation	34 A	Processing equipment	62 O
Pest --no evidence	07 A	Operational sanitation	35 A	Processing records	63 O
Pest control program	08 A	Waste disposal	36 A	Empty can inspection	64 O
Pest control monitoring	09 A	2. DISEASE CONTROL		Filling procedures	65 O
Temperature control	10 A	Animal identification	37 A	Container closure exam	66 O
Lighting	11 A	Antemortem inspec. procedures	38 A	Interim container handling	67 O
Operations work space	12 A	Antemortem dispositions	39 A	Post-processing handling	68 O
Inspector work space	13 A	Humane Slaughter	40 U	Incubation procedures	69 O
Ventilation	14 A	Postmortem inspec. procedures	41 A	Process. defect actions -- plant	70 O
Facilities approval	15 A	Postmortem dispositions	42 A	Processing control -- inspection	71 O
Equipment approval	16 A	Condemned product control	43 A	5. COMPLIANCE/ECON. FRAUD CONTROL	
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control	44 A	Export product identification	72 A
Over-product ceilings	17 U	Returned and rework product	45 A	Inspector verification	73 A
Over-product equipment	18 A	3. RESIDUE CONTROL		Export certificates	74 A
Product contact equipment	19 U	Residue program compliance	46 A	Single standard	75 A
Other product areas (inside)	20 A	Sampling procedures	47 A	Inspection supervision	76 A
Dry storage areas	21 A	Residue reporting procedures	48 A	Control of security items	77 A
Antemortem facilities	22 A	Approval of chemicals, etc.	49 A	Shipment security	78 A
Welfare facilities	23 A	Storage and use of chemicals	50 A	Species verification	79 A
Outside premises	24 A	4. PROCESSED PRODUCT CONTROL		"Equal to" status	80 O
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim	51 U	Imports	81 A
Personal dress and habits	25 A	Boneless meat reinspection	52 A		
Personal hygiene practices	26 A	Ingredients identification	53 A		
Sanitary dressing procedures	27 M	Control of restricted ingredients	54 A		

FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE July 13, 2001	ESTABLISHMENT NO. AND NAME Bertin Ltda SIF 4507	CITY Mozarlandia
			COUNTRY Brazil
NAME OF REVIEWER Dr. M. Douglas Parks	NAME OF FOREIGN OFFICIAL Dr. Ari Crispim Dos Anjos		EVALUATION <input type="checkbox"/> Acceptable <input checked="" type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable

COMMENTS:

This is a new U.S. Certification by the Brazilian Inspection (DIPOA). It was certified on May 15, 2001, see enclosed certification from DIPOA.

51--Rail dust was found on product inside vacuum packages resulting from inadequate pre-boning trim.

19--In the slaughter department, the moving viscera table was coming up for use with residues from previous uses.

40--Almost all animals were being hit with the stun gun two or more times.

28--The buccal cavity was opened before the mouth cavity was washed resulting in possible contamination of exposed product with ingesta.

17--Condensate was falling onto exposed carcasses in the carcass cooler.

27--The employee who was cutting across the anus, continued the cut into other tissues without sanitizing the knife.

HACCP--Some critical limits are not attainable as stated.

HACCP--Pre-shipment is not being performed.

HACCP--Not all of the corrective actions are written in the program.

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE INTERNATIONAL PROGRAMS		REVIEW DATE	ESTABLISHMENT NO. AND NAME		CITY
FOREIGN PLANT REVIEW FORM		July 16, 2001	Sadia, S A SIF 785		Paranagua
				COUNTRY Brazil	
NAME OF REVIEWER Dr. M. Douglas Parks		NAME OF FOREIGN OFFICIAL Dr. Ari Crispim Dos Anjos		EVALUATION <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable	
CODES (Give an appropriate code for each review item listed below) A = Acceptable M = Marginally Acceptable U = Unacceptable N = Not Reviewed O = Does not apply					
1. CONTAMINATION CONTROL		Cross contamination prevention	28 A	Formulations	55 O
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing	29 A	Packaging materials	56 O
Water potability records	01 A	Product handling and storage	30 A	Laboratory confirmation	57 O
Chlorination procedures	02 A	Product reconditioning	31 A	Label approvals	58 O
Back siphonage prevention	03 A	Product transportation	32 A	Special label claims	59 O
Hand washing facilities	04 A	(d) ESTABLISHMENT SANITATION PROGRAM		Inspector monitoring	60 O
Sanitizers	05 A	Effective maintenance program	33 A	Processing schedules	61 O
Establishments separation	06 A	Preoperational sanitation	34 A	Processing equipment	62 O
Pest --no evidence	07 A	Operational sanitation	35 A	Processing records	63 O
Pest control program	08 A	Waste disposal	36 A	Empty can inspection	64 O
Pest control monitoring	09 A	2. DISEASE CONTROL		Filling procedures	65 O
Temperature control	10 A	Animal identification	37 O	Container closure exam	66 O
Lighting	11 A	Antemortem inspec. procedures	38 O	Interim container handling	67 O
Operations work space	12 A	Antemortem dispositions	39 O	Post-processing handling	68 O
Inspector work space	13 A	Humane Slaughter	40 O	Incubation procedures	69 O
Ventilation	14 A	Postmortem inspec. procedures	41 O	Process. defect actions -- plant	70 O
Facilities approval	15 A	Postmortem dispositions	42 O	Processing control -- inspection	71 O
Equipment approval	16 A	Condemned product control	43 A	5. COMPLIANCE/ECON. FRAUD CONTROL	
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control	44 O	Export product identification	72 A
Over-product ceilings	17 A	Returned and rework product	45 O	Inspector verification	73 A
Over-product equipment	18 A	3. RESIDUE CONTROL		Export certificates	74 A
Product contact equipment	19 A	Residue program compliance	46 A	Single standard	75 A
Other product areas (inside)	20 A	Sampling procedures	47 A	Inspection supervision	76 A
Dry storage areas	21 A	Residue reporting procedures	48 A	Control of security items	77 A
Antemortem facilities	22 O	Approval of chemicals, etc.	49 A	Shipment security	78 A
Welfare facilities	23 A	Storage and use of chemicals	50 A	Species verification	79 O
Outside premises	24 A	4. PROCESSED PRODUCT CONTROL		"Equal to" status	80 O
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim	51 A	Imports	81 O
Personal dress and habits	25 A	Boneless meat reinspection	52 A		
Personal hygiene practices	26 A	Ingredients identification	53 A		
Sanitary dressing procedures	27 O	Control of restricted ingredients	54 A		

FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE July 16, 2001	ESTABLISHMENT NO. AND NAME Sadia, S A SIF 785	CITY Paranagua
			COUNTRY Brazil
NAME OF REVIEWER Dr. M. Douglas Parks	NAME OF FOREIGN OFFICIAL Dr. Ari Crispim Dos Anjos	EVALUATION <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable	

COMMENTS:

This is a cold storage plant and does no further processing to the product. It only handles pre-packaged product. No HACCP program is required for this type of operation.

SSOP--No preventative action is recorded.

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE INTERNATIONAL PROGRAMS		REVIEW DATE	ESTABLISHMENT NO. AND NAME		CITY
FOREIGN PLANT REVIEW FORM		July 17, 2001	Bertin, Ltda SIF 3181		Navirai
				COUNTRY	
				Brazil	
NAME OF REVIEWER Dr. M. Douglas Parks		NAME OF FOREIGN OFFICIAL Dr. Ari Crispim Dos Anjos		EVALUATION <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable	
CODES (Give an appropriate code for each review item listed below)					
A = Acceptable M = Marginally Acceptable U = Unacceptable N = Not Reviewed O = Does not apply					
1. CONTAMINATION CONTROL		Cross contamination prevention		28 A	Formulations
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing		29 M	Packaging materials
Water potability records	01 A	Product handling and storage		30 A	Laboratory confirmation
Chlorination procedures	02 A	Product reconditioning		31 A	Label approvals
Back siphonage prevention	03 A	Product transportation		32 A	Special label claims
Hand washing facilities	04 A	(d) ESTABLISHMENT SANITATION PROGRAM			Inspector monitoring
Sanitizers	05 A	Effective maintenance program		33 A	Processing schedules
Establishments separation	06 A	Preoperational sanitation		34 A	Processing equipment
Pest --no evidence	07 A	Operational sanitation		35 A	Processing records
Pest control program	08 A	Waste disposal		36 A	Empty can inspection
Pest control monitoring	09 A	2. DISEASE CONTROL			Filling procedures
Temperature control	10 A	Animal identification		37 A	Container closure exam
Lighting	11 A	Antemortem inspec procedures		38 A	Interim container handling
Operations work space	12 A	Antemortem dispositions		39 A	Post-processing handling
Inspector work space	13 A	Humane Slaughter		40 A	Incubation procedures
Ventilation	14 A	Postmortem inspec. procedures		41 A	Process. defect actions -- plant
Facilities approval	15 A	Postmortem dispositions		42 A	Processing control -- inspection
Equipment approval	16 A	Condemned product control		43 A	5. COMPLIANCE/ECON. FRAUD CONTROL
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control		44 A	Export product identification
Over-product ceilings	17 A	Returned and rework product		45 A	Inspector verification
Over-product equipment	18 U	3. RESIDUE CONTROL			Export certificates
Product contact equipment	19 M	Residue program compliance		46 A	Single standard
Other product areas (inside)	20 A	Sampling procedures		47 A	Inspection supervision
Dry storage areas	21 A	Residue reporting procedures		48 A	Control of security items
Antemortem facilities	22 A	Approval of chemicals, etc.		49 A	Shipment security
Welfare facilities	23 A	Storage and use of chemicals		50 A	Species verification
Outside premises	24 A	4. PROCESSED PRODUCT CONTROL			"Equal to" status
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim		51 A	Imports
Personal dress and habits	25 A	Boneless meat reinspection		52 A	
Personal hygiene practices	26 A	Ingredients identification		53 A	
Sanitary dressing procedures	27 A	Control of restricted ingredients		54 A	

FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE July 17, 2001	ESTABLISHMENT NO. AND NAME Bertin, Ltda SIF 3181	CITY Navirai COUNTRY Brazil
NAME OF REVIEWER Dr. M. Douglas Parks	NAME OF FOREIGN OFFICIAL Dr. Ari Crispim Dos Anjos		EVALUATION <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable

COMMENTS:

18--Condensate from cooling units blown onto exposed carcasses in the carcass cooler.

19--Trays for exposed product in the offal area were cracked and with residues from previous days uses.

29--In the slaughter department, the carcass splitting saw sanitizer would not accomodate the complete saw.

SSOP--No preventative action is recorded.

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE INTERNATIONAL PROGRAMS		REVIEW DATE	ESTABLISHMENT NO. AND NAME		CITY
FOREIGN PLANT REVIEW FORM		July 18, 2001	BF Productos Alimenticios, Ltda SIF 458		Presidente Epitacio
				COUNTRY Brazil	
NAME OF REVIEWER Dr. M. Douglas Parks		NAME OF FOREIGN OFFICIAL Dr. Ari Crispim Dos Anjos		EVALUATION <input type="checkbox"/> Acceptable <input checked="" type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable	
CODES (Give an appropriate code for each review item listed below) A = Acceptable M = Marginally Acceptable U = Unacceptable N = Not Reviewed O = Does not apply					
1. CONTAMINATION CONTROL		Cross contamination prevention		28 A	Formulations A
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing		29 A	Packaging materials A
Water potability records	01 A	Product handling and storage		30 A	Laboratory confirmation O
Chlorination procedures	02 A	Product reconditioning		31 A	Label approvals O
Back siphonage prevention	03 A	Product transportation		32 A	Special label claims O
Hand washing facilities	04 A	(d) ESTABLISHMENT SANITATION PROGRAM			Inspector monitoring A
Sanitizers	05 A	Effective maintenance program		33 M	Processing schedules O
Establishments separation	06 A	Preoperational sanitation		34 A	Processing equipment O
Pest --no evidence	07 A	Operational sanitation		35 A	Processing records O
Pest control program	08 A	Waste disposal		36 A	Empty can inspection O
Pest control monitoring	09 A	2. DISEASE CONTROL			Filling procedures O
Temperature control	10 A	Animal identification		37 O	Container closure exam O
Lighting	11 A	Antemortem inspec. procedures		38 O	Interim container handling O
Operations work space	12 A	Antemortem dispositions		39 O	Post-processing handling O
Inspector work space	13 A	Humane Slaughter		40 O	Incubation procedures O
Ventilation	14 A	Postmortem inspec. procedures		41 O	Process. defect actions -- plant O
Facilities approval	15 A	Postmortem dispositions		42 O	Processing control -- inspection O
Equipment approval	16 A	Condemned product control		43 A	5. COMPLIANCE/ECON. FRAUD CONTROL
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control		44 O	Export product identification A
Over-product ceilings	17 A	Returned and rework product		45 O	Inspector verification A
Over-product equipment	18 A	3. RESIDUE CONTROL			Export certificates A
Product contact equipment	19 A	Residue program compliance		46 A	Single standard A
Other product areas (inside)	20 A	Sampling procedures		47 A	Inspection supervision A
Dry storage areas	21 A	Residue reporting procedures		48 A	Control of security items A
Antemortem facilities	22 O	Approval of chemicals, etc.		49 A	Shipment security A
Welfare facilities	23 A	Storage and use of chemicals		50 A	Species verification A
Outside premises	24 A	4. PROCESSED PRODUCT CONTROL			"Equal to" status O
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim		51 A	Imports A
Personal dress and habits	25 A	Boneless meat reinspection		52 A	
Personal hygiene practices	26 A	Ingredients identification		53 A	
Sanitary dressing procedures	27 O	Control of restricted ingredients		54 A	

FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE July 18, 2001	ESTABLISHMENT NO. AND NAME BF Productos Alimenticios, Ltda SIF 458		CITY Presidente Epitacio
				COUNTRY Brazil
NAME OF REVIEWER Dr. M. Douglas Parks	NAME OF FOREIGN OFFICIAL Dr. Ari Crispim Dos Anjos		EVALUATION <input type="checkbox"/> Acceptable <input checked="" type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable	

COMMENTS:

Three shipments of fully cooked frozen product were returned from the USA due to Salmonells contamination. An internal BF Company investigation revealed that hydraulic oil in a exposed cooked product compressing ram was contaminated with Salmonella bacteria. It was assumed that leaking oil contaminated the product. The oil has been changed to USDA approved edible oil and daily bacterial testing of product and oil will be done to affirm that the problem has been solved before resuming shipments to the USA. Inspection Officials of Brazil Inspection (DIPOA) will monitor this situation and keep FSIS informed.

33--Residues of previous days operations were under an exposed product belt.

SSOP--No preventative action recorded.

HACCP--Some critical limits are not measurable.

HACCP--No preventative action recorded.

HACCP--Pre-shipment reviews are not recorded.

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE INTERNATIONAL PROGRAMS FOREIGN PLANT REVIEW FORM		REVIEW DATE July 19, 2001	ESTABLISHMENT NO. AND NAME Bertin, Ltda SIF 504		CITY Ituiutaba COUNTRY Brazil
NAME OF REVIEWER Dr. M. Douglas Parks		NAME OF FOREIGN OFFICIAL Dr. Ari Crispim Dos Anjos		EVALUATION <input type="checkbox"/> Acceptable <input checked="" type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable	
CODES (Give an appropriate code for each review item listed below) A = Acceptable M = Marginally Acceptable U = Unacceptable N = Not Reviewed O = Does not apply					
1. CONTAMINATION CONTROL		Cross contamination prevention		28 A	Formulations A
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing		29 A	Packaging materials A
Water potability records	01 A	Product handling and storage	30 A		Laboratory confirmation O
Chlorination procedures	02 A	Product reconditioning	31 A		Label approvals O
Back siphonage prevention	03 A	Product transportation	32 A		Special label claims O
Hand washing facilities	04 A	(d) ESTABLISHMENT SANITATION PROGRAM			Inspector monitoring A
Sanitizers	05 A	Effective maintenance program	33 A		Processing schedules O
Establishments separation	06 A	Preoperational sanitation	34 A		Processing equipment O
Pest --no evidence	07 A	Operational sanitation	35 A		Processing records O
Pest control program	08 A	Waste disposal	36 A		Empty can inspection O
Pest control monitoring	09 A	2. DISEASE CONTROL			Filling procedures O
Temperature control	10 A	Animal identification	37 A		Container closure exam O
Lighting	11 A	Antemortem inspec. procedures	38 A		Interim container handling O
Operations work space	12 A	Antemortem dispositions	39 A		Post-processing handling O
Inspector work space	13 A	Humane Slaughter	40 A		Incubation procedures O
Ventilation	14 A	Postmortem inspec. procedures	41 A		Process. defect actions -- plant O
Facilities approval	15 A	Postmortem dispositions	42 A		Processing control -- inspection O
Equipment approval	16 A	Condemned product control	43 A	5. COMPLIANCE/ECON. FRAUD CONTROL	
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control	44 A	Export product identification	72 A
Over-product ceilings	17 U	Returned and rework product	45 A	Inspector verification	73 A
Over-product equipment	18 A	3. RESIDUE CONTROL		Export certificates	74 A
Product contact equipment	19 A	Residue program compliance	46 A	Single standard	75 A
Other product areas (inside)	20 A	Sampling procedures	47 A	Inspection supervision	76 A
Dry storage areas	21 A	Residue reporting procedures	48 A	Control of security items	77 A
Antemortem facilities	22 A	Approval of chemicals, etc.	49 A	Shipment security	78 A
Welfare facilities	23 A	Storage and use of chemicals	50 A	Species verification	79 A
Outside premises	24 A	4. PROCESSED PRODUCT CONTROL		"Equal to" status	80 O
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim	51 U	Imports	81 A
Personal dress and habits	25 A	Boneless meat reinspection	52 A		
Personal hygiene practices	26 A	Ingredients identification	53 A		
Sanitary dressing procedures	27 A	Control of restricted ingredients	54 A		

FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE July 19, 2001	ESTABLISHMENT NO. AND NAME Bertin, Ltda SIF 504	CITY Ituiutaba
			COUNTRY Brazil
NAME OF REVIEWER Dr. M. Douglas Parks	NAME OF FOREIGN OFFICIAL Dr. Ari Crispim Dos Anjos	EVALUATION <input type="checkbox"/> Acceptable <input checked="" type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable	

COMMENTS:

17, 51--Condensate was falling from overhead structures that were not cleaned and sanitized daily onto exposed carcasses in two coolers. In cooler number 10 carcasses were being removed and sent to the boning without trimming the surfaces contaminated with falling condensate.

SSOP--No preventative action recorded.

HACCP--No preventative action recorded.

HACCP--Pre-shipment reviews not recorded.

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE INTERNATIONAL PROGRAMS		REVIEW DATE	ESTABLISHMENT NO. AND NAME		CITY
FOREIGN PLANT REVIEW FORM		July 23, 2001	Bertin, Ltda SIF 1662		Campo Grande
NAME OF REVIEWER Dr. M. Douglas Parks		NAME OF FOREIGN OFFICIAL Dr. Ari Crispim Dos Anjos		EVALUATION <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable	
CODES (Give an appropriate code for each review item listed below) A = Acceptable M = Marginally Acceptable U = Unacceptable N = Not Reviewed O = Does not apply					
1. CONTAMINATION CONTROL		Cross contamination prevention		28 A	Formulations 55 A
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing		29 M	Packaging materials 56 A
Water potability records	01 A	Product handling and storage		30 A	Laboratory confirmation 57 O
Chlorination procedures	02 A	Product reconditioning		31 A	Label approvals 58 O
Back siphonage prevention	03 A	Product transportation		32 A	Special label claims 59 O
Hand washing facilities	04 A	(d) ESTABLISHMENT SANITATION PROGRAM			Inspector monitoring 60 A
Sanitizers	05 A	Effective maintenance program		33 A	Processing schedules 61 O
Establishments separation	06 A	Preoperational sanitation		34 A	Processing equipment 62 O
Pest --no evidence	07 A	Operational sanitation		35 A	Processing records 63 O
Pest control program	08 A	Waste disposal		36 A	Empty can inspection 64 O
Pest control monitoring	09 A	2. DISEASE CONTROL			Filling procedures 65 O
Temperature control	10 A	Animal identification		37 A	Container closure exam 66 O
Lighting	11 A	Antemortem inspec. procedures		38 A	Interim container handling 67 O
Operations work space	12 A	Antemortem dispositions		39 A	Post-processing handling 68 O
Inspector work space	13 A	Humane Slaughter		40 A	Incubation procedures 69 O
Ventilation	14 A	Postmortem inspec. procedures		41 A	Process. defect actions -- plant 70 O
Facilities approval	15 A	Postmortem dispositions		42 A	Processing control -- inspection 71 O
Equipment approval	16 A	Condemned product control		43 A	5. COMPLIANCE/ECON. FRAUD CONTROL
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control		44 A	Export product identification 72 A
Over-product ceilings	17 A	Returned and rework product		45 A	Inspector verification 73 A
Over-product equipment	18 M	3. RESIDUE CONTROL			Export certificates 74 A
Product contact equipment	19 M	Residue program compliance		46 A	Single standard 75 A
Other product areas (inside)	20 M	Sampling procedures		47 A	Inspection supervision 76 A
Dry storage areas	21 A	Residue reporting procedures		48 A	Control of security items 77 A
Antemortem facilities	22 A	Approval of chemicals, etc.		49 A	Shipment security 78 A
Welfare facilities	23 A	Storage and use of chemicals		50 A	Species verification 79 A
Outside premises	24 A	4. PROCESSED PRODUCT CONTROL			"Equal to" status 80 O
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim		51 A	Imports 81 A
Personal dress and habits	25 A	Boneless meat reinspection		52 A	
Personal hygiene practices	26 A	Ingredients identification		53 A	
Sanitary dressing procedures	27 M	Control of restricted ingredients		54 A	

FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE July 23, 2001	ESTABLISHMENT NO. AND NAME Bertin, Ltda SIF 1662	CITY Campo Grande COUNTRY Brazil
NAME OF REVIEWER Dr. M. Douglas Parks	NAME OF FOREIGN OFFICIAL Dr. Ari Crispim Dos Anjos		EVALUATION <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable

COMMENTS:

19--In the slaughter department, the moving viscera table was coming up for use with residues from previous use.

20--A floor drain beneath the viscera table was plugged resulting in a large flooded area near exposed product equipment.

29--The carcass split saw sanitizing equipment would not accomodate all of the product contact surfaces of the saw.

18--Water overspray from the carcass wash was dropping from the rail onto exposed carcasses.

29--There was an area of common touch for carcasses right after the hide puller. This is before final inspection.

27--The employee that was cutting across the anus was continuing the cut into other tissues without sanitizing the knife.

SSOP--No preventative was recorded.

HACCP--No preventative action was recorded.

HACCP--Pre-shipment review is not recorded.

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE INTERNATIONAL PROGRAMS		REVIEW DATE	ESTABLISHMENT NO. AND NAME		CITY
FOREIGN PLANT REVIEW FORM		July 24, 2001	Friboi, Ltda SIF 385		Andradina
NAME OF REVIEWER Dr. M. Douglas Parks		NAME OF FOREIGN OFFICIAL Dr. Ari Crispim Dos Anjos		COUNTRY Brazil	
EVALUATION					
<input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable					
CODES (Give an appropriate code for each review item listed below)					
A = Acceptable M = Marginally Acceptable U = Unacceptable N = Not Reviewed O = Does not apply					
1. CONTAMINATION CONTROL		Cross contamination prevention		28 A	Formulations
(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing		29 A	Packaging materials
Water potability records	01 A	Product handling and storage		30 A	Laboratory confirmation
Chlorination procedures	02 A	Product reconditioning		31 A	Label approvals
Back siphonage prevention	03 A	Product transportation		32 A	Special label claims
Hand washing facilities	04 A	(d) ESTABLISHMENT SANITATION PROGRAM			Inspector monitoring
Sanitizers	05 A	Effective maintenance program		33 A	Processing schedules
Establishments separation	06 A	Preoperational sanitation		34 A	Processing equipment
Pest --no evidence	07 A	Operational sanitation		35 A	Processing records
Pest control program	08 A	Waste disposal		36 A	Empty can inspection
Pest control monitoring	09 A	2. DISEASE CONTROL			Filling procedures
Temperature control	10 A	Animal identification		37 A	Container closure exam
Lighting	11 A	Antemortem inspec. procedures		38 A	Interim container handling
Operations work space	12 A	Antemortem dispositions		39 A	Post-processing handling
Inspector work space	13 A	Humane Slaughter		40 A	Incubation procedures
Ventilation	14 A	Postmortem inspec. procedures		41 A	Process. defect actions -- plant
Facilities approval	15 A	Postmortem dispositions		42 A	Processing control -- inspection
Equipment approval	16 A	Condemned product control		43 A	5. COMPLIANCE/ECON. FRAUD CONTROL
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control		44 A	Export product identification
Over-product ceilings	17 A	Returned and rework product		45 A	Inspector verification
Over-product equipment	18 A	3. RESIDUE CONTROL			Export certificates
Product contact equipment	19 U	Residue program compliance		46 A	Single standard
Other product areas (inside)	20 M	Sampling procedures		47 A	Inspection supervision
Dry storage areas	21 A	Residue reporting procedures		48 A	Control of security items
Antemortem facilities	22 A	Approval of chemicals, etc.		49 A	Shipment security
Welfare facilities	23 A	Storage and use of chemicals		50 A	Species verification
Outside premises	24 A	4. PROCESSED PRODUCT CONTROL			"Equal to" status
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim		51 A	Imports
Personal dress and habits	25 A	Boneless meat reinspection		52 A	
Personal hygiene practices	26 A	Ingredients identification		53 A	
Sanitary dressing procedures	27 A	Control of restricted ingredients		54 A	

FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE July 24, 2001	ESTABLISHMENT NO. AND NAME Friboi, Ltda SIF 385	CITY Andradina
	COUNTRY Brazil		
NAME OF REVIEWER Dr. M. Douglas Parks	NAME OF FOREIGN OFFICIAL Dr. Ari Crispim Dos Anjos	EVALUATION <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable	

COMMENTS:

19--In the slaughter department, the moving visera table was coming up for use with residues from the previous use.

20--An absorbant material that holds moisture was on the underside of all exposed product scales.

HACCP--No preventative action recorded.

HACCP--Pre-shipment reviews not recorded.

FOREIGN PLANT REVIEW FORM

July 26,
2001

Jack Link's do Brazil SIF 3673

COUNTRY
Brazil

NAME OF REVIEWER
Dr. M. Douglas Parks

NAME OF FOREIGN OFFICIAL
Dr. Ari Crispim Dos Anjos

EVALUATION

☒ Acceptable ☐ Acceptable/
Re-review ☐ Unacceptable

CODES (Give an appropriate code for each review item listed below)

A = Acceptable **M** = Marginally Acceptable **U** = Unacceptable **N** = Not Reviewed **O** = Does not apply

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(a) BASIC ESTABLISHMENT FACILITIES		Equipment Sanitizing	29 A	Packaging materials	56 A
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Establishments separation	06 A	Preoperational sanitation	34 A	Processing equipment	62 O
Pest --no evidence	07 A	Operational sanitation	35 A	Processing records	63 O
Pest control program	08 M	Waste disposal	36 A	Empty can inspection	64 O
Pest control monitoring	09 A	2. DISEASE CONTROL		Filling procedures	65 O
Temperature control	10 A	Animal identification	37 O	Container closure exam	66 O
Lighting	11 A	Antemortem inspec. procedures	38 O	Interim container handling	67 O
Operations work space	12 A	Antemortem dispositions	39 O	Post-processing handling	68 O
Inspector work space	13 A	Humane Slaughter	40 O	Incubation procedures	69 O
Ventilation	14 A	Postmortem inspec. procedures	41 O	Process. defect actions -- plant	70 O
Facilities approval	15 A	Postmortem dispositions	42 O	Processing control -- inspection	71 O
Equipment approval	16 A	Condemned product control	43 A	5. COMPLIANCE/ECON. FRAUD CONTROL	
(b) CONDITION OF FACILITIES EQUIPMENT		Restricted product control	44 O	Export product identification	72 A
Over-product ceilings	17 A	Returned and rework product	45 O	Inspector verification	73 A
Over-product equipment	18 A	3. RESIDUE CONTROL		Export certificates	74 A
Product contact equipment	19 M	Residue program compliance	46 O	Single standard	75 A
Other product areas (<i>inside</i>)	20 A	Sampling procedures	47 O	Inspection supervision	76 A
Dry storage areas	21 A	Residue reporting procedures	48 O	Control of security items	77 O
Antemortem facilities	22 O	Approval of chemicals, etc.	49 A	Shipment security	78 A
Welfare facilities	23 A	Storage and use of chemicals	50 A	Species verification	79 A
Outside premises	24 A	4. PROCESSED PRODUCT CONTROL		"Equal to" status	80 O
(c) PRODUCT PROTECTION & HANDLING		Pre-boning trim	51 A	Imports	81 A
Personal dress and habits	25 A	Boneless meat reinspection	52 A		
Personal hygiene practices	26 A	Ingredients identification	53 A		
Sanitary dressing procedures	27 A	Control of restricted ingredients	54 A		

FOREIGN PLANT REVIEW FORM (reverse)	REVIEW DATE	ESTABLISHMENT NO. AND NAME		CITY
	July 26, 2001	Jack Link's do Brazil	SIF 3673	Itupeva COUNTRY Brazil
NAME OF REVIEWER Dr. M. Douglas Parks	NAME OF FOREIGN OFFICIAL Dr. Ari Crispim Dos Anjos		EVALUATION <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Acceptable/ Re-review <input type="checkbox"/> Unacceptable	

COMMENTS:

19--Residues were on the final product table ready for use.

30--Condensate from an overhead cooling unit was splashing onto exposed product.

08--Poison rodent baits are located inside the establishment in production related locations.

HACCP--The program specifies that temperature is recorded by a thermograph. The instrument was not reliable and the temperature was taken by a hand held thermometer contrary to the program and recorded on the thermograph.

SSOP--Production start was delayed because of sanitation problems discovered during pre-operational sanitation inspection but no records of the problems or corrective action were recorded.

SSOP--The procedure was not dated and signed by the person with overall on site authority.

HACCP--The critical control limits are not clearly stated.

FEDERAL PUBLIC SERVICE
MINISTRY OF AGRICULTURE AND SUPPLY – MA
DEPARTMENT OF FARMING AND CATTLE
INSPECTION OF PRODUCTS OF ANIMAL ORIGIN
DIVISION OF INTERNATIONAL COMMERCE CONTROL

Document no. 198/02/DCI/DIPOA

Brasilia, 04/19/2002

From: Director, International Control Division - DCI,
From the Department of Inspection of Products of Animal Origin - DIPOA

To: Counselor for Agricultural Affairs
US Embassy

Subject: Noncompliance Report (NR) generated by FSIS after inspection of Brazilian establishments.

Dear Counselor,

In reply to the NR generated by FSIS upon inspection of Brazilian establishments during the period of time between July 11 and August 3rd, 2001, conducted by Dr. Douglas Parks, we would like to further present the following comments.

1. Corrective actions instituted by the establishments upon detection of irregularities during inspection:
 - Dr. Parks' oral observations made during his visits and final meeting with DIPOA were passed on to all accredited establishments for export into the USA through circular-letter 560/01/DCI/DIPOA (Appendix 1).
 - Due to the delay in receiving the NR from the inspection that took place in July/August 2001 and another inspection that occurred in January/February 2002, we would like to relay those corrective actions incorporated by the establishment in reply to Dr. Choudry's oral observations during visits and final meeting with DIPOA (Appendix 2).
 - The fact that we received Dr. Parks' NR after Dr. Choudry's inspection caused a few misunderstandings regarding the comments received during the first inspection. Consequently, several establishments took corrective actions without basing them on the official FSIS report, what caused in specific cases repetition of the irregularity previously detected, due to the fact that the corrective actions instituted were inadequate.
2. Cases of cross-contamination:
 - As highlighted in Dr. Parks' NR, all noncompliance observed during inspection were promptly corrected by plant management.
 -

3. Inadequate compliance with HACCP, including critical control points selection, determination of critical measurable limits and application of pre-shipment review:
 - Those cases of noncompliance relating to plans SSOP and HACCP were corrected by the establishment where they were detected, according with oral observations made during inspection. All corrective actions, listed in detail for to each facility, will be submitted upon receipt of Dr. Choudry's NR;
 - Pre-shipment Review was instituted in those establishments that were not previously following this procedure;
 - Guidelines for implementation of pre-shipment review, as well as comments regarding HACCP compliance, were sent to all accredited establishments authorized for export into the USA. This was performed through Circular-letter 560/01/DCI/DIPOA (Appendix 1).
4. Deficiencies in knowledge and training in HACCP found in the majority of federal inspectors and staff at the establishment:
 - DIPOA is organizing a training session in HACCP for all MAPA accredited veterinaries and for key management personnel responsible for the plan at the establishment.
 - Training will focus mainly on those deficiencies pointed out by FSIS inspection, as well as risk analysis encompassing all production stages, to determine measurable critical control points and relevant for Public Health, to set measurable critical limits, to include preventive measures, verification and validation procedures, among others.
 - Furthermore, detailed information regarding those deficiencies pointed out during inspection was submitted to the Federal Inspection Services of the exporting establishment through Circular-letter 114/2002/DCI/DIPOA (Appendix 3).
5. Lack of monthly inspections: after March, 2002, monthly inspections will be performed in all establishments exporting meat products into the USA (Appendix 4: Circular-letter 106/02/DCI/DIPOA). As settled during the teleconference between FSIS and DIPOA on February 26, 2002, a proposal of equivalency of the Brazilian quarterly inspections system to the American monthly inspections system will be submitted to FSIS, based on the permanent character of our Federal Inspection Services within the premises of the establishment.

Regarding FSIS 471, the report generated by Dr. Ari Crispim dos Anjos was sent to FSIS through the Embassy of the United States of America. It's receipt was acknowledged by Dr. Parks via e-mail, according to Letter 109/2002 DCI/DIPOA (Appendix 5).

As agreed upon during the teleconference that took place on February 26, 2002 between FSIS and DIPOA, we are enclosing Circular-letters 113 and 115/2002/DCI/DIPOA (Appendix 6) for FSIS evaluation, which are intended to serve as guidelines for veterinaries at the Federal Inspection Service regarding the deficiencies pointed out during inspection.

Sincerely,

Marcelo Vieira Mazzini
Federal Inspector, Agriculture and Cattle Production
Veterinary – CRMV-RS – 2040
Director, DCI-DIPOA